

From: [ANDERSON Jim M](#)
To: [Kristine Koch/R10/USEPA/US@EPA](#); [Eric Blischke/R10/USEPA/US@EPA](#); [Chip Humphrey/R10/USEPA/US@EPA](#)
Cc: [GAINER Tom](#); [LARSEN Henning](#)
Subject: ARCO Source Control
Date: 10/03/2006 02:38 PM

The purpose of this e-mail is to update you on some recent actions at the ARCO site, seek your agreement on a general path forward, & seek your participation in future project actions.

Background

DEQ, EPA, & ARCO met 5/4/06. In that meeting, ARCO presented an overview of the site, operations, & previously completed source control measures. ARCO said that the existing concrete seawall/revetment (which was installed years ago for geotech/stability reasons, not source control) is failing; needs to be removed; & a new seawall needs to be constructed. ARCO advised that a sheet pile wall needs to be installed along their entire shoreline for slope stability. ARCO also proposed to do a riverward sediment removal during the demolition of the seawall/revetment, if the extent of contaminated sediment was limited to the beach & near shore area (i.e., sediment contamination did not extend very far into the river). ARCO proposed to do an in-water, sediment investigation in summer '06 to determine the extent of contamination. DEQ & ARCO both understood that EPA was, at least initially, willing to let ARCO do the proposed work (demolition, limited sediment removal, & construction of a new seawall) under DEQ oversight with support from EPA..., with the understanding that sediment removal would be restricted to the near-shore area.

9/28/06 DEQ/ARCO Meeting

ARCO summarized the results of their summer '06 sediment investigation &, using a cleanup target of 340 mg/kg TPH-D, concluded that sediment contamination did not extent very far from the shore. ARCO advised us that they believed the sediment removal could be completed by removing 2/3 of the sediment from the beach & 1/3 of the sediment from the river near the shore during seasonal low water. ARCO expects to submit a Basis for Design Report to DEQ in late-11/06. ARCO expects to secure the necessary permits & contractors to do the sheet pile wall installation, revetment demolition, & sediment removal in summer '07.

Input from EPA

1) We'll schedule DEQ's ARCO PM, Tom Gainer, to attend the 10/12 meeting with Kristine, Matt, & I. Tom can give a more in-depth explanation of the site, source control, sediment investigation, & ARCO's new proposal.

2) We want to verify that EPA is still willing to allow ARCO's proposed work to proceed under DEQ oversight. We'll want to share the results of the sediment investigation & ARCO's proposal for sediment removal with you before you make your final decision.

3) Engage Kristine as EPA's lead supporting DEQ's likely oversight of ARCO's work. Kristine would coordinate with Chip & Eric so that they can integrate ARCO's source control work with the in-water RI/FS. In addition to EPA's support from the source control perspective, we request EPA input on the compatibility of this sediment removal project with the anticipated final in-water remedy. In other words, we want Chip & Eric to weigh-in on whether ARCO's yet to be proposed sediment removal action levels can reasonably be expected to achieve final clean-up levels for the RI/FS.

Action Items

1) DEQ will schedule a meeting between ARCO/DEQ/EPA for ARCO to roll-out the results of their sediment investigation & source control proposal in early-12/06.

2) EPA should respond with any initial comments to this approach & confirm your willingness to attend a 12/06 project roll-out meeting.

James M. Anderson
DEQ Northwest Region
Portland Harbor Section
Phone (503) 229-6825
Fax (503) 229-6899